Supplementary written evidence submitted by YouTube

Tuesday 15th December 2020

Dear Mr Knight,

The Future of Public Service Broadcasting - additional information

Thank you for inviting us to give evidence to the Committee as part of your inquiry into the future of Public Service Broadcasting. We were pleased to have the opportunity to share our views about the distinct place that video sharing platforms like YouTube occupy in the broadcasting ecosystem, and to tell you more about how we support Public Service Broadcasters in the UK to achieve their goals and reach new audiences. During the session, we offered to write to the Committee to provide further information about some of the issues raised by members. I hope the below is helpful to you as you finalise your report into this important issue and do not hesitate to get in touch if you require any additional clarity from YouTube.

YouTube’s support for Public Service Broadcasters

As we mentioned during our appearance at the Committee, YouTube is not a broadcaster or a large-scale commissioner of content but rather a platform that provides tools to our users to help them reach audiences and share their creativity and passions. We work closely with the UK’s public service broadcasters to help them make use of these tools and to achieve their goals. For broadcasters like ITV and Channel 4, YouTube can provide new ways to monetise their content and create revenue streams, whereas the BBC uses our platform to help it reach and attract a wider variety of audiences to their network.

We are proud of our relationship with these broadcasters, and the success they have found on our platform:

- Every UK public service broadcaster has at least one channel on YouTube, and many have several channels.
- We work closely with the BBC to help them to reach younger audiences in particular. This has been a very successful partnership: BBC Radio 1 has over seven million subscribers on YouTube, with more than three billion views on its content, while BBC Three has over 2.1 million subscribers and nearly one billion views. YouTube is also an important channel for the BBC’s authoritative news content. BBC News has more than eight million subscribers on our platform.
- ITV and C4 have had a similar levels of success across their YouTube channels accruing more than ten million subscribers.
- ITV and Channel 4 are amongst the broadcasters that choose to monetise their content on YouTube. Whenever a broadcaster chooses to monetise on our platform, they keep the majority of any revenue that arises from that content.
• YouTube also allows the UK’s public service broadcasters to find and monetise international audiences with greater ease than ever before. Whilst this can provide an revenue stream outside of the UK market for their content it also allows broadcasters and producers to grow popularity for their shows beyond Britain. The United Kingdom is a fantastic exporter of video content with 84% of UK creators' watch time coming from outside the UK.

We are also proud of our positive impact on the wider creative economy in the UK. In 2019, the total contribution of YouTube’s creative ecosystem to the UK’s GDP was £1.4bn, and this ecosystem supported 30,000 Full Time Equivalent (FTE) jobs, as set out in our 2019 Impact report.

Monetizing BBC content

During our evidence session, we were asked to provide further information on the potential revenue that the BBC could generate if it chose to monetise its content on YouTube. We assume that, given the subject of the enquiry this is referencing BBC Public Service broadcast function specifically, who currently do not choose to monetise its content on YouTube in the UK or abroad. They use the platform to reach a wider audience and to drive viewers to their own platforms (such as iPlayer, BritBox, or BBC Sounds).

We work very closely with BBC Public Service to help them achieve these objectives and to use the tools available on our platform. We would, of course, also be willing to support the BBC if it decided to monetise its content. However, given the number of variables involved, we are unable to provide an accurate estimate of how much revenue this might generate for the Corporation. A broadcaster can, for example, choose to upload short clips of their content to YouTube or to upload entire programmes. The BBC could also choose to monetise content on all or only a selection of its channels, or to monetise content in certain markets only. As we discussed during our evidence session, our commercial relationships with broadcasters and other creators are commercially confidential but any broadcaster keeps the majority of advertising revenue when it chooses to monetise content.

Removing harmful content on YouTube and keeping our users safe

Keeping our users safe is our priority at YouTube and we have clear community guidelines that outline what content is or is not acceptable on our platform. We act quickly to remove content that does not meet these guidelines and work hard to promote high quality and authoritative content to ensure our users have the best possible experience.

I referenced our transparency report and promised to confirm the exact number of removals. At that time, the most recent Q2 report showed we had removed 11,401,696 videos between April and June 2020, 95% of these videos were first flagged by machines rather than humans and, of those detected by machines, just over 77% were removed before they got to 10 views. Since the committee hearing, we have also released our Q3 Community Enforcement report showing that, between July and September 2020, we removed 7,872,684 videos for violating our community
guidelines; around 93% of these videos were removed using automated flagging tools, of which just over 80% were removed having received ten views or less.

During our evidence session, we discussed the specific issue of misinformation related to COVID-19. We work to tackle this in two key ways. Firstly, YouTube works with the NHS and others to ensure that YouTube users see accurate and authoritative content in relation to the pandemic. We have introduced:

- A COVID-19 news shelf; on our homepage that features stories from the health authorities like the NHS and the WHO as well as trusted news sources;
- Health information panels that appear in search results and that feature NHS information on COVID-19 symptoms, prevention, and treatment;
- Links to the NHS website on the watch pages of COVID-19 related videos.
- An information panel on the YouTube homepage pointing users to NHS information about COVID-19. These information panels have received over 400 billion impressions worldwide and, in the UK, we have seen consumption of authoritative news sources increase six and a half times as a result of our efforts.

Secondly, YouTube’s Community Guidelines feature clear policies that prohibit content content that spreads medical misinformation that contradicts local health authorities’ (in our case, the NHS) or the World Health Organization’s (WHO) medical information about COVID-19. You can read more about our specific Medical Misinformation rules here.

The Committee asked specifically about the monetization of content relating to COVID-19 that breaches our community guidelines. We remove videos that violate our guidelines on COVID-19. In addition, we do not allow creators to monetise if they repeatedly violate our guidelines on COVID-19 and you will have noted that last month we also joined the government commitment to tackle vaccine disinformation, including the principle that no user or company should directly profit from this kind of content and that platforms should promote authoritative vaccine content.

In terms of COVID-19 specifically, we treat the pandemic as a “sensitive event” for Google Ads. This policy prohibits ads with “content that potentially capitalizes on or lacks reasonable sensitivity towards a natural disaster, conflict, death, public health emergency, or other tragic event.” As part of our enforcement of this policy, we do not allow ads to run on our platforms where it appears an advertiser may be engaged in price gouging or where the ads contain or target certain keywords, regardless of ad or site content. This means that all Google ads related to coronavirus will be disapproved unless the advertisers has been pre-certified and approved (in other words, we allow COVID-19-related advertising from approved organisations, including the UK Government and the NHS).

The Google Ads Dangerous or Derogatory Content policies also prohibits the monetization of content "promoting or advocating for harmful health or medical claims or practices". Under this policy, we demonetise publisher content that includes claims about COVID-19 that contradict health advice from the WHO and others (such as theories claiming 5G towers are a transmission vector). This summer, we also introduced additional protections by expanding our
dangerous or derogatory content policies for both publishers and advertisers. As a result, content contradicted by scientific consensus during COVID-19 (origin theories about where the virus originated from, for example, or claims that the virus is a hoax or government-funded) are not permitted on our platform.

**Influencer marketing on YouTube**

During the session, we also discussed a number of issues relating to young influencers, the impact on young viewers, and sponsorship by junk food companies.

When it comes to young influencers and viewers it is important to note that YouTube Kids has clear policies against paid product placements or endorsements. Videos where the content owner has disclosed a paid product placement or endorsement will be blocked from the YouTube Kids app. On YouTube Main, videos with a known Paid Product Promotion will have a disclosure on the video itself, and creators are instructed to follow locally relevant guidance in their specific market. It is also worth noting that any product placement that is Made for Kids needs to comply with our Made for Kids ads policies, including that certain ad categories are prohibited, like all Food and Beverage ads irrespective of nutritional content.

YouTube complies with all UK laws and regulations in relation to advertising and of course we require advertisers to comply themselves with local legal requirements, including those introduced by the Audiovisual Media Services Directive (AVMSD) that was recently transposed into UK law and which will be implemented by Ofcom. In addition to these legal requirements, we have our own advertising policies which set out what types of advertising are permitted on our platform, which are designed to protect users.

We have invested heavily to better protect children on our platforms, with rigorous advertising policies that limit the types of products and services that may be promoted to children. On YouTube, for example, we created a separate platform specifically for children (YouTube Kids) that provides a safe and easy way for kids to explore on their own in a contained environment and controls for parents to guide that journey. There is no personalized advertising permitted on YouTube Kids, nor advertisements for restricted products (i.e. video games with industry ratings above 12 years of age) or ads that contain prohibited content, and all ads undergo review to ensure compliance with our policies. For instance, ads for products related to consumable food and drinks are prohibited, regardless of nutrition content on YouTube Kids.

On the main version of YouTube, we have also introduced the ‘Made for Kids’ designation, and ads eligible to serve on content designated as ‘made for kids’ must meet almost identical ads policies and protections as those enforced on YouTube Kids. This includes a prohibition on ads for any food and beverage products.

In addition to protecting users, we also want to help our advertising partners achieve their commercial goals - which include acting responsibly and in compliance with the law - and we have a strong track record of providing them with the necessary tools to do so. This is why, as I referenced in my evidence, in October we introduced a new policy to ensure advertisers in the
EU & UK meet increased regulations around digital marketing to children in relation to the promotion of High Fat Salt Sugar food and beverage products. Under this new policy, advertisers promoting HFSS products in the EU and UK will be required to self-declare these campaigns on an account level. Once this process is complete, all adverts served from the account will be labeled as HFSS content and restricted from serving to minors (users under the age of 18) or signed-out users on YouTube.

YouTube provides guidelines also on what is known as “influencer marketing” content. Any paid promotional videos on YouTube have to be disclosed as such, and must abide by all YouTube ads policies as outlined above (including compliance with all applicable laws and regulations for all locations where an ad or video is showing). Furthermore, we don’t allow paid promotional content on YouTube Kids. If we find a video or channel that violates our policies about paid promotional content, we take appropriate action against that content. We've been making ongoing changes to YouTube and YouTube Kids to improve the quality of videos surfaced to children. We have also published a Field Guide for Creating Family Content, which is a public resource for creators to help them produce high quality family content.

**YouTube shopping features**

Finally you asked some questions on our shopping features. We are in the early stages of limited testing of new features aimed at building shopping experience on YouTube and enabling viewers to see product offers for the products added by creators in their videos, although these features are not currently available to UK users. For any purchase option offered as part of these features, pricing of the products and applicable fees are determined by the merchants and are subject to merchants’ terms and conditions.

I hope the information included above is helpful to the Committee. Thank you again for providing us with the opportunity to give evidence and I look forward to meeting with the Committee again later this week in the Covid-19 antivax evidence session.

Best wishes,

Iain Bundred
Head of Public Policy, UK & Ireland
YouTube